

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kathleen Gosser aka	: No. 19-12325 - MDC
	:
Kathleen Grace, debtor	: Chapter 13
	:
Quicken Loans Inc.	:
v.	:
	:
Kathleen Gosser aka	:
	:
Kathleen Grace, debtor	:

Response to Motion for Relief filed by **Quicken Loans Inc.**

Debtor, by and through their her, responds as follows:

1-5. Admitted.

6. Admitted in part and denied in part. Debtor had just returned to work prior to filing and should now be able to start making payments.

7-10 Denied. It has only been two (2) months and debtor should be able to start making payments. Movant is adequately protected and the real estate is necessary to an effective reorganization.

11. Admitted. Debtor is attempting to obtain a loan modification.

WHEREFORE, it is respectfully requested that the Motion be DENIED except for the ability to pursue loss mitigation with debtor..

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